

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 20-221
	)	
vs.	)	The Honorable Arthur J. Schwab
	)	
JORDAN COYNE	)	

**MOTION FOR LEAVE OF COURT  
TO TRAVEL OUTSIDE OF THE WESTERN DISTRICT OF  
PENNSYLVANIA**

1. The Defendant is charged at the above number and term with violating 18 United States Code, Sections 2 and 231(a) (3).
2. At his initial appearance, Mr. Coyne was released on an unsecured bond.
3. Since then, the Defendant has been fully compliant with the terms of his unsecured bond and the conditions of pretrial release.
4. Mr. Coyne is scheduled to change his plea to guilty on March 2, 2022, and, with Court approval, to receive an 11(c)(1)(C) sentence of 18 months of incarceration.
5. The Defendant is a self-employed remodeling contractor.
6. Pending his change of plea hearing, Mr. Coyne seeks permission to travel to the state of California from February 17, 2022 to February 25, 2022 along with his partner, Anna Elizabeth Rewalt.
7. The combined purpose of the trip is to accompany his partner to California to visit her friends and family, and also to perform carpentry work at the residence of a family member of his partner located at 3844 Dartmouth Way, Livermore CA, 94550.
8. While in California, they will reside with Josh Arce at 12109 Allard Street, Norwalk, CA 90650.

9. Their method of travel will be by airplane.
10. Mr. Coyne intends to arrive back to Pennsylvania on February 25, 2022.
11. At all times while the Defendant is traveling and residing outside of the district, he will abide by all of the terms and conditions of his bond and pretrial release.
12. On February 4, 2022, counsel discussed this motion and proposed order with Mr. Coyne's FPO, Matt Anderson, and he advised counsel that he had no objection to the granting of the within Motion.
13. The Government defers to the judgment of the FPO in this request.

**WHEREFORE**, the Defendant respectfully requests that the Court enter an Order granting him leave to travel outside of the Western District of Pennsylvania on the dates and at the location set forth herein.

Respectfully submitted,

/s/ William J. McCabe

DeBERNARDO, ANTONIONO,  
McCABE & DAVIS, P.C.  
11 North Main Street  
Greensburg, PA 15601  
PA ID No. 32618  
(724) 836-0700  
Attorney for Defendant

